

Environmental Planning Office – Standard Comments Dated 3/2/04

The Environmental Planning Office (EPO) is responsible for several surface water quality management programs mandated by the federal Clean Water Act or dictated by State policy . (<http://www.state.hi.us/doh/eh/epo/wqm/wqm.htm>). Among these responsibilities, EPO:

- maintains the *List of Impaired Waters in Hawaii Prepared under Clean Water Act §303(d)* (<http://www.state.hi.us/doh/eh/epo/wqm/303dpcfinal.pdf>);
- develops and establishes Total Maximum Daily Loads (TMDLs) for listed waters (suggesting how much existing pollutant loads should be reduced in order to attain water quality standards, please see <http://www.epa.gov/owow/tmdl/intro.html>);
- writes TMDL Implementation Plans describing how suggested pollutant load reductions can be achieved; and
- conducts assessments of stream habitat quality and biological integrity.

To facilitate TMDL development and implementation, and to assist with our assessment of the potential impact of proposed actions upon water quality, pollutant loading, and biological resources in receiving waters, we suggest that environmental review documents, permit applications, and related submittals include the following standard information and analyses:

Waterbody type and class

1. Identify the waterbody type and class, as defined in Hawaii Administrative Rules Chapter 11-54 (<http://www.state.hi.us/doh/rules/11-54.pdf>), of all potentially affected water bodies¹.

Existing water quality management actions

2. Identify any existing National Pollutant Discharge Elimination System (NPDES) permits and related connection permits (issued by permittees) that will govern the management of water that runs off or is discharged from the proposed project site or facility. Please include NPDES and other permit numbers; names of permittees, permitted facilities, and receiving waters (including waterbody type and class as in 1. above); diagrams showing drainage/discharge pathways and outfall locations; and note any permit conditions that may specifically apply to the proposed project.
3. Identify any planning documents, groups, and projects that include specific prescriptions for water quality management at the proposed project site and in the potentially affected waterbodies. Please note those prescriptions that may specifically apply to the proposed project.

Pending water quality management actions

4. Identify all potentially affected water bodies that appear on the current *List of Impaired Waters in Hawaii Prepared under Clean Water Act §303(d)* including the listed

waterbody, geographic scope of listing, and pollutant(s) (See Table 7 at <http://www.state.hi.us/doh/eh/epo/wqm/303dpcfinal.pdf>).

5. If the proposed project involves potentially affected water bodies that appear on the current *List of Impaired Waters in Hawaii Prepared under Clean Water Act §303(d)*, identify and quantify expected changes in the following site and watershed conditions and characteristics:
 - surface permeability
 - hydrologic response of surface (timing, magnitude, and pathways)
 - receiving water hydrology
 - runoff and discharge constituents
 - pollutant concentrations and loads in receiving waters
 - aquatic habitat quality and the integrity of aquatic biota

Where TMDLs are already established they include pollutant load allocations for the surrounding lands and point source discharges. In these cases, we suggest that the submittal specify how the proposed project would contribute to achieving the applicable load reductions.

Where TMDLs are yet to be established and implemented, a first step in achieving TMDL objectives is to prevent any project-related increases in pollutant loads. This is generally accomplished through the proper application of suitable best management practices in all phases of the project and adherence to any applicable ordinances, standards, and permit conditions. In these cases we suggest that the submittal specify how the proposed project would contribute to reducing the polluted discharge and runoff entering the receiving waters, including plans for additional pollutant load reduction practices in future management of the surrounding lands and drainage/discharge systems.

Proposed Action and Alternatives Considered

We suggest that each submittal identify and analyze potential project impacts at a watershed scale by considering the potential contribution of the proposed project to cumulative, multi-project watershed effects on hydrology, water quality, and aquatic and riparian ecosystems.

We also suggest that each submittal broadly evaluate project alternatives by identifying more than one engineering solution for proposed projects. In particular, we suggest the consideration of "alternative," "soft," and "green" engineering solutions for channel modifications that would provide a more environmentally friendly and aesthetically pleasing channel environment and minimize the destruction of natural landscapes.

If you have any questions about these comments or EPO programs, please contact Ryan Davenport at 586-4346.

¹"Potentially affected waterbodies" means those in which proposed project activity would take place and any others that could receive water discharged by the proposed project activity or water flowing down from the proposed project site. These waterbodies can be presented as a chain of receiving waters whose top link is at the project site upslope and whose bottom link is in

Pacific Ocean "oceanic waters," with all receiving waters named according to conventions established by Chapter 11-54 and the *List of Impaired Waters in Hawaii Prepared under Clean Water Act §303(d)*. For example, a recent project proposed for Nuhelewai Stream, Oahu (a tributary of Kapalama Canal) might potentially affect Nuhelewai Stream, Kapalama Canal, Honolulu Harbor and Shore Areas, and the Pacific Ocean.